

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

STEVEN MANN, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Civil Action No. 3:20-cv-820 (REP)
	:	
PRINCETON ALTERNATIVE FUNDING, LLC,	:	
<i>et al.</i> ,	:	
	:	
Defendants.	:	

**NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE AS TO
DEFENDANTS PRINCETON ALTERNATIVE FUNDING, LLC, PRINCETON
ALTERNATIVE INCOME FUND, L.P., PHILIP BURGESS, ALONZO PRIMUS,
WALTER WOJCIECHOWSKI, MICROBILT FINANCIAL SERVICES
CORPORATION, AND LJP CONSULTING, LLC**

Pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, Plaintiffs hereby dismiss the above-styled action without prejudice against the Defendants Princeton Alternative Funding, LLC, Princeton Alternative Income Fund, L.P., Philip Burgess, Alonzo Primus, Walter Wojciechowski, Microbilt Financial Services Corporation, and LJP Consulting, LLC.

Plaintiffs filed this complaint, in part, based on the deposition testimony of Walter Wojciechowski, who indicated that Defendants provided capital to a tribal lending entity owned by the Big Valley Band of Pomo Indians. Based on representations from their counsel and documents provided, Defendants have represented that this previous testimony was either incorrect or misunderstood. Defendants claim that they instead invested in a tribal lending entity known as “Big Valley Financial, LLC,” *i.e.*, a different tribal lending entity owned by the Big Valley Band of Pomo Indians, but not the one who issued the loans to these specific named Plaintiffs. Although Plaintiffs believe there is a reasonable basis to allege that Defendants are part of a single

conspiracy, Plaintiffs are dismissing this case until more information is obtained from the tribal officials regarding the operations of their businesses.¹

This dismissal is not intended to include the claims against Philip Gomez, Michael Gomez, Chris McCloud, Vivian McCloud, and the John Does 1-15. Plaintiffs intend to file an Amended Complaint pursuant to Rule 15(a)(1) to remove the allegations against Defendants Princeton Alternative Funding, LLC, Princeton Alternative Income Fund, L.P., Philip Burgess, Alonzo Primus, Walter Wojciechowski, Microbilt Financial Services Corporation, and LJP Consulting, LLC.

Respectfully submitted,
PLAINTIFFS

/s/ Leonard A. Bennett
Leonard A. Bennett, Esq., VSB #37523
CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Blvd., Ste. 1-A
Newport News, VA 23601
Telephone: (757) 930-3660
Facsimile: (757) 930-3662
Email: lenbennett@clalegal.com
Counsel for Plaintiffs

¹ Defendant Burgess has sued on a personal basis the attorneys representing the consumers in this matter and others, including a recent attempt to amend a complaint in a pending action with respect to counsel's representation in this case. While it is possible that the present action could have preceded against him as is, that distraction can await a later day.

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of December, 2020, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

/s/

Leonard A. Bennett, Esq., VSB #37523
CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Blvd., Ste. 1-A
Newport News, VA 23601
Telephone: (757) 930-3660
Facsimile: (757) 930-3662
Email: lenbennett@clalegal.com
Counsel for Plaintiffs